

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA  
SOUTH BEND DIVISION

BROOKE KLEVEN and CHRISTOPHER	)	
KLEVEN Individually and as Parents and	)	
Natural Guardians of HENDRIK KLEVEN,	)	Removal from the St. Joseph Circuit Court
a Minor, JAMES KLEVEN, a Minor,	)	Cause No. 71C01-2111-CT-000437
Deceased, and NATALIE KLEVEN, a Minor,	)	
Deceased,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	CAUSE NO. 3:21-cv-00961-JD-MGG
	)	
ST. JOSEPH COUNTY, JEFFREY DOWNEY,	)	
In His Official Capacity, JENNIFER	)	
STITSWORTH, In Her Official Capacity,	)	
CITY OF MISHAWAKA, CLAY TOWNSHIP,	)	
GREAT LAKES CAPITAL MANAGEMENT ,	)	
LLC DBA CITY PLAZA, LLC, BRADLEY	)	
COMPANY, LLC and MOTOROLA	)	
SOLUTIONS, INC.,	)	
	)	
Defendants.	)	

**NOTICE OF AUTOMATIC INITIAL EXTENSION OF TIME**

Defendant Clay Township, by counsel, pursuant to Northern District Local Rule 6-1(b), for its Notice of Automatic Initial Extension of Time to Respond to Plaintiffs' Complaint, state as follows:

1. Defendant was recently served with Plaintiffs' Complaint, and said Complaint was recently removed from state court.
2. The deadline to respond to Plaintiffs' Complaint following removal is **December 28, 2021**, and such deadline has not expired or previously been extended.
3. The extension does not interfere with case management plans, scheduled hearings, or other case deadlines.

4. Undersigned counsel attempted to contact Plaintiffs' counsel regarding the automatic extension of time to respond and did not receive a response prior to the filing of this Notice.

WHEREFORE, Defendant Clay Township, by counsel, respectfully prays this Court for an order granting them an additional 28 days, up to and including **January 25, 2022**, in which to respond to Plaintiffs' Complaint and for all other relief proper in the premises.

Respectfully submitted,

/s/ Jeb A. Crandall  
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*One of the Attorneys for Defendant Clay Township*

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 27<sup>th</sup> day of December, 2021 a true and complete copy of the foregoing document was served electronically upon all counsel of record via email generated by the Court's ECF system to the following:

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